

REMARKS

The Office Action states that claims 14-19 are allowed and that claim 10 (currently objected to) would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicant thanks the Examiner for the indication of allowable subject matter.

Rejection of Claims 1 – 9, 11 - 13 (paragraphs 1-2 of the Office Action)

The Examiner has rejected claims 1-3, 5-9, and 11-13 under 35 U.S.C. 103(a) as being unpatentable over Shotbolt 4,793,737 (“Shotbolt”) in view of Thiebaud et al. 6,082,391 (“Theibaud”). Even assuming that there is some suggestion or motivation to modify or to combine the cited references in the manner suggested, a conclusion with which Applicant respectfully disagrees, the prior art relied upon by the Examiner cannot render claims 1- 9 and 11 - 13 obvious for at least the reason that such prior art references when combined do not teach or suggest all of the limitations of said claims. (See M.P.E.P § 2143.) Specifically, contrary to the Examiner’s assertions in paragraphs 1 and 5 of the Office Action, Thiebaud does not teach the use of steel catenary risers (SCR’s) with a hybrid tower as combined. Indeed, Thiebaud does not even disclose an SCR. The Examiner alleges that item 8 in Figure 7 and col. 3, line 53-63 of Thiebaud disclose an SCR. Applicant respectfully points out, however, that item 8 in Figure 7 is a hybrid riser, not an SCR, as made clear by Theibaud itself:

Such risers, sometimes known as hybrid risers, may consist according to the invention--as depicted diagrammatically in cross-section in FIG. 9--of a vertical bundle of steel pipes which are, at least in part, supported by buoyancy means; such risers comprise a straight tubular central structure made of steel which extends vertically. . . .

(See Thiebaud, col. 1, lines 32-37 and Figure 9 (underlining added).) The riser referred to in Figure 9 in the above passage from Theibaud is, in fact, item 8, the same riser cited by the Examiner in Figure 7 of Thiebaud. Referring again to the riser 8 alleged by the Examiner to be an SCR, Thiebaud further states that

[w]ith reference to FIG. 9, the riser 8 comprises a tubular central structure 23 consisting of a steel tube delimiting a cylindrical cavity 25. . . . This central

structure 23 is more or less straight, and has a longitudinal axis 26 extending, in the position of use, more or less vertically, as illustrated in particular in FIG. 1.

(See Theibaud, col. 3, lines 53-65 and Figure 1 (underlining added).) On the other hand, it is well known that SCR's adopt a free-hanging catenary shape when positioned. Riser 8, which terminates within connection 41 in Figure 7a, has no such free-hanging catenary shape. Specifically, referring to Figure 7a, Thiebaud states that the base of riser 8 (indicated by reference numeral 9) connects to the bundles 20 running along the sea-bed via a bent portion of pipeline and via connection 41. (See Theibaud, col. 5, lines 55-57 and Figure 7a.) Hence, no part of riser 8 forms a catenary. Moreover, the "bent portion of pipeline" is part of the pipe, and is not an SCR.

The term "steel catenary riser" is well understood by those of skill in the art. For example, the American Petroleum Institute (API) publication entitled "Design of Risers for Floating Production Systems (FPSs) and Tension-Leg Platforms (TLPs)" (hereafter the "API Publication"), a copy of which is being provided to the Examiner on even date herewith, defines steel catenary riser (SCR) as "a prolongation of a sub sea pipeline attached to an FPS in a catenary shape." (See API Publication, p. 140, definition A.1.109.) The API Publication illustrates an SCR in Figure 6 on page 15. Other industry materials similarly define SCR's. According to the Technip Glossary (a web page, a copy of which is being provided to the Examiner), SCR is defined as

a steel riser suspended from a floater and connected horizontally on the seabed, like a flexible riser. Because of the large deflection required by this configuration, it is generally only feasible for very long lengths, in large water depths.

Further, the publication entitled "Update On the Design of Steel Catenary Riser Systems," a copy of which is being provided on even date herewith to the Examiner, states on page 1 that "[t]he steel catenary concept is inherently simple. Lay a pipeline on the seabed and simply pick up the end and connect to the production vessel forming a free-hanging 'simple' catenary."

In view of the above, it is abundantly clear that the riser 8 and surrounding structures in Theibaud is not an SCR and cannot reasonably be considered to be an SCR.

Objection to Claim 10 (paragraph 6 of the Office Action)

For the reasons given above, the claims from which claim 10 depends cannot be rendered obvious by the references cited by the Examiner. Accordingly, Applicant respectfully requests that the objection to claim 10 be withdrawn.

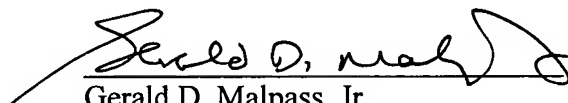
CONCLUSION

In view of the remarks and amendments set forth above, Applicant respectfully requests withdrawal of the Examiner's rejections and objections and allowance of all claims, claims 1-13 and presently allowed claims 14-19. If the Examiner believes that a telephonic interview will help advance the application, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

January 24, 2006

Date



Gerald D. Malpass, Jr.

Reg. No. 40,079

Attorney for Applicants

ExxonMobil Upstream Research Company

P.O. Box 2189

Houston, Texas 77252-2189

Telephone: (713) 431-4577

Fax: (713) 431-4664

Certificate of Mailing Under 37 C.F.R. §1.8

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P. O. Box 1450, Alexandria, VA 22313-1450 on January 24, 2006.


Margaret Gnewuch